

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| In Re: | : | |
| Heidi Dougherty | : | Chapter 13 |
| Michael J. Dougherty | : | Case No.: 20-14619-MDC |
| Debtor(s) | : | |

APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES

Brad J. Sadek, Esquire applies under §330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. Applicant is counsel for the Debtor.
2. The Debtor filed a petition under the Bankruptcy Code on December 2, 2020.
3. The Debtor's annualized current monthly income as set forth on Form B22C is:

_____ above median (the amount on line 15 is not less than the amount on line 16)

__X__ below median (the amount on line 15 is less than the amount on line 16).
4. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.
5. Applicant requests an award of compensation of \$9,726.00 for providing the following services:

| Date | Work Completed | By Whom | Hours |
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| 10/19/2020 | Service of documents list required to prepare bankruptcy schedules and Credit Counseling Course instructions | Paralegal | 0.3 |
| 11/30/2020 | Email correspondence to Debtors requesting documents and completion of Credit Counseling Course in order to file Emergency Bankruptcy to stop sheriff sale | Paralegal | 0.3 |
| 12/02/2020 | Preparation of Emergency Bankruptcy Filing including generating Credit Report, PACER Search, and local county dockets and generating E-Signatures and service of the same to Debtors | Paralegal | 1.0 |
| 12/02/2020 | Further email correspondence with Debtors to advise of the necessary procedures in order to promote a successful emergency filing | Paralegal | 0.8 |

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| 12/02/2020 | E-filing of Emergency Bankruptcy Petition and service of Notice of Bankruptcy filing to Creditors of whom property was at risk | Paralegal | 0.5 |
| 12/04/2020 | Email Correspondence to Debtors advising of documents required to complete preparation of their remaining schedules | Paralegal | 0.3 |
| 12/07/2020 | Further email correspondence discussing the remaining documents required to prepare remaining schedules | Paralegal | 0.3 |
| 12/09/2020 | Additional email correspondence advising the imperativeness of documents still needed to complete remaining schedules | Paralegal | 0.5 |
| 12/14/2020 | Email correspondence to Debtors advising that no documents have been received in order to prepare remaining schedules | Paralegal | 0.2 |
| 12/16/2020 | Preparation and filing of Motion to Extend Deadline for Filing Remaining Schedules | Paralegal | 0.5 |
| 12/16/2020 | Email correspondence with Debtors advising of the imperativeness of documents still needed and why for completion of remaining schedules | Paralegal | 0.5 |
| 12/28/2020 | Receipt and sorting of Debtors documents via fax and forwarding the same to Attorney for Remaining Petition Schedule prep | Paralegal | 0.3 |
| 12/30/2020 | Preparation and filing of Second Motion to Extend Deadline for Filing Remaining Schedules | Paralegal | 0.5 |
| 12/30/2020 | Email correspondence with Debtors requesting 2019 Tax Returns | Attorney | 0.5 |
| 12/30/2020 | Preparation and Review of Remaining Petition Schedules with Debtors and generation of e-signatures for Petition signing | Attorney | 1.0 |
| 12/31/2020 | Email correspondence with Debtors reviewing changes needed in the Petition and request for e-signatures on Petition | Attorney | 0.5 |
| 01/04/2021 | E-filing of Remaining Chapter 13 Petition and Schedules including filing of the Chapter 13 Plan and Means Test Form 22a | Paralegal | 0.5 |
| 01/04/2021 | Preparation and service of Debtors case information including Trustee name and plan payment amount and second Credit Counseling Course Instructions | Paralegal | 0.5 |
| 01/12/2021 | Correspondence to Debtors regarding Motion for Relief filed | Paralegal | 0.3 |
| 01/13/2021 | Telephonic conference with Debtors to review Motion for Relief | Attorney | 0.5 |
| 01/13/2021 | E-mail correspondence to opposing counsel to request Stipulation Settlement of MFR | Attorney | 0.3 |
| 01/15/2021 | E-mail correspondence to opposing counsel | Attorney | 0.3 |
| 01/19/2021 | E-mail correspondence to Debtors to advise of opposing counsel's communication | Attorney | 0.5 |

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| 01/22/2021 | Preparation and filing of Response to Motion for Relief | Attorney | 0.5 |
| 01/27/2021 | Preparation of Notice of 341 Letter and file preparation including redaction, resizing, scanning, uploading, and organization of files due to Ch 13 Trustee prior to the Hearing and e-service of Notice to Debtors | Paralegal | 0.8 |
| 01/29/2021 | E-mail correspondence with Debtors requesting proof of mortgage payments made in order to settle MFR | Attorney | 0.8 |
| 01/30/2021 | Additional e-mail correspondence with Debtors regarding settlement of MFR | Attorney | 0.2 |
| 02/01/2021 | E-mail correspondence with Debtors in advisement of continued MFR Hearing | Attorney | 0.2 |
| 02/03/2021 | E-mail correspondence to Debtors following up on documents required prior to 341 Hearing | Paralegal | 0.2 |
| 02/04/2021 | E-mail correspondence to Debtors further advising of 341 Hearing | Attorney | 0.2 |
| 02/04/2021 | Further email correspondence with Debtors advising of mortgage payment bouncing and outstanding MFR | Attorney | 0.5 |
| 02/05/2021 | E-mail correspondence with Debtors regarding documents outstanding prior to 341 Hearing | Attorney | 0.3 |
| 02/08/2021 | E-mail correspondence with Debtors regarding documents outstanding prior to 341 Hearing | Attorney | 0.5 |
| 02/08/2021 | File preparation including redaction, resizing, scanning, uploading, and organization of newly received documents due to Ch 13 Trustee prior to the Hearing | Paralegal | 0.5 |
| 02/09/2021 | E-mail correspondence to Debtors advising of documents required for the Hearing | Attorney | 0.8 |
| 02/11/2021 | E-mail correspondence with Debtors regarding Motion to Dismiss for Plan Payments | Attorney | 0.5 |
| 02/12/2021 | E-mail correspondence requesting remaining documents outstanding prior to 341 Hearing | Attorney | 0.5 |
| 02/15/2021 | E-mail correspondence to Debtors requesting proof of mortgage payment made | Attorney | 0.2 |
| 02/17/2021 | E-mail correspondence with Debtors regarding documents required prior to 341 Hearing | Attorney | 0.2 |
| 02/21/2021 | E-mail correspondence with Debtors regarding documents required prior to 341 Hearing | Attorney | 0.5 |
| 02/22/2021 | E-mail correspondence to Debtors regarding status of MFR Hearing | Attorney | 0.2 |
| 02/23/2021 | Follow-up e-mail correspondence with Debtors regarding status of MFR Hearing | Attorney | 0.8 |
| 02/24/2021 | Attendance of MFR Hearing and review of the same with Debtors | Attorney | 2.5 |
| 03/04/2021 | E-mail correspondence with Debtors regarding result of MFR Hearing | Attorney | 0.5 |
| 03/09/2021 | E-mail correspondence with Debtors regarding Motion to Dismiss for Payments | Attorney | 0.3 |
| 03/12/2021 | E-mail correspondence with Debtors advising of Dismissed | Attorney | 0.5 |

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| | Chapter 13 Case | | |
| 03/24/2021 | E-mail correspondence with Debtors regarding status of payments and steps to take if Debtors wished to continue with this active Chapter 13 Case | Attorney | 0.3 |
| 03/30/2021 | Telephonic conference with Debtors to discuss future course of action for case | Attorney | 0.5 |
| 04/06/2021 | E-mail correspondence with Debtors to discuss future course of action for case | Attorney | 0.3 |
| 04/09/2021 | E-mail correspondence to Debtors advising of risk of filing discussed Motion to Reinstate | Attorney | 0.1 |
| 04/12/2021 | E-mail correspondence with Debtors reviewing Proof of Trustee Payments and Mortgage Payments made in order to prepare Motion to Reinstate | Attorney | 0.5 |
| 04/20/2021 | E-mail correspondence requesting additional information to support proposed Objection to Mortgage Claim | Attorney | 0.5 |
| 04/27/2021 | E-mail correspondence with Debtors further advising of necessary amount to cure mortgage payments | Attorney | 0.5 |
| 04/30/2021 | E-mail correspondence from Debtors in re: Proof of Mortgage payment | Attorney | 0.1 |
| 05/04/2021 | E-mail correspondence to opposing counsel | Attorney | 0.7 |
| 05/05/2021 | E-mail correspondence with Debtors regarding dismissed Bankruptcy case and vehicle repossession | Attorney | 0.5 |
| 05/06/2021 | E-mail correspondence with Debtors re: Mortgage and Trustee Payments | Attorney | 0.8 |
| 05/07/2021 | E-mail correspondence with Debtors re: Mortgage and Trustee Payments | Attorney | 0.5 |
| 05/10/2021 | Reached out to opposing counsel via telephone; left voice message | Attorney | 0.2 |
| 05/11/2021 | Email Correspondence with opposing counsel | Attorney | 0.5 |
| 05/14/2021 | Preparation and filing of Objection to Claim 15-1 of TruMark Financial | Attorney | 0.5 |
| 05/17/2021 | E-mail correspondence with opposing counsel | Attorney | 0.5 |
| 05/28/2021 | E-mail correspondence with Debtors regarding future course of action and resolve for MFR | Attorney | 0.8 |
| 06/01/2021 | Preparation, review and e-filing of Amended Plan and Amended Schedules I & J with Debtors to cover mortgage arrears and trustee arrears | Attorney | 2.5 |
| 06/01/2021 | E-service of Amended Plan to Debtors | Paralegal | 0.2 |
| 06/08/2021 | Preparation and attendance of Hearing for Motion to Reinstate Chapter 13 Case. | Attorney | 2.0 |

7. The Debtor paid Applicant \$2,295.00, plus filing fees, prior to the filing of the petition.
8. A copy of the Applicant's disclosure of compensation pursuant to Fed. R. Bankr. P. 2016(b) is attached hereto as Exhibit "A."
9. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C. §504(c) applies.

WHEREFORE, Applicant requests an award of \$9,726.00 in further compensation and of \$0.00 in reimbursement of actual, necessary expenses.

Dated: June 3, 2021

/s/ Brad J. Sadek, Esquire

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